

REMARKS/ARGUMENTS

Reconsideration and withdrawal of the rejections of the application are respectfully requested in view of the amendments and remarks herewith.

I. STATUS OF THE CLAIMS AND FORMAL MATTERS

Claims 1-3 and 5-7 are pending. Claims 1 and 5, which are independent, are hereby amended. Claims 4 and 8 have been canceled without prejudice or disclaimer of subject matter. Support for the amendments is provided throughout the Specification, specifically at page 11.

No new matter has been introduced. Changes to claims are not made for the purpose of patentability within the meaning of 35 U.S.C. §101, §102, §103, or §112. Rather, these changes are made simply for clarification and to round out the scope of protection to which Applicant is entitled.

II. REJECTIONS UNDER 35 U.S.C. §103(a)

Claims 1-3 and 5-7 were rejected under 35 U.S.C. 103(a) as allegedly unpatentable over U.S. Patent No. 6,757,694 to Goodman et al. (hereinafter, merely “Goodman”) in view of U.S. Publication No. 2002/0161852 to Allen et al. (hereinafter, merely “Allen”) and further in view of U.S. Patent No. 6,880,101 to Golasky et al. (hereinafter, merely “Golasky”).

III. RESPONSE TO REJECTIONS

Claim 1 recites, *inter alia*:

“A tape library apparatus to which a node ID is assigned and that is connected to a host computer, comprising:

...a switch for switching the tape library apparatus between a library mode and one or more other operation modes.

wherein the first addresses and the second addresses are stored in a nonvolatile memory disposed in corresponding drive...

(emphasis added)

First, Applicant respectfully submits that Goodman, Allen and Golasky, taken alone or in combination, fail to teach or suggest “a switch for switching the tape library apparatus between a library mode and one or more other operation modes”, as recited in claim 1 (emphasis added).

Second, the Office Action (see page 4) relies on column 2, lines 62-64 and column 4, lines 53-55 of Goodman to reject wherein the first addresses and the second addresses are stored in a nonvolatile memory disposed in corresponding drives, as recited in claim 1 (emphasis added).

Column 2, lines 62-64 of Goodman describes storing serial number identifiers in a non-volatile memory 26 in Figure 3. Applicant respectfully submits that the non-volatile memory 26 is not disposed in a drive in direct contrast with Applicant’s claimed a nonvolatile memory disposed in corresponding drives.

Column 4, lines 53-55 of Goodman describes that “the base WWN is stored in nonvolatile memory somewhere in the library (PROM, battery backup RAM, hard disk, code image, etc.).” None of the exemplary nonvolatile memory of Goodman discloses or suggests a nonvolatile memory disposed in corresponding drives, as recited in claim 1.

Therefore, the combination of Goodman and Allen will not teach or suggest the first addresses and the second addresses are stored in a nonvolatile memory disposed in corresponding drive, as recited in claim 1. Applicant respectfully submits that Goodman, Allen and Golasky, taken alone or in combination, fail to teach or suggest the above-identified features of claim 1.

Therefore, Applicant respectfully submits that claim 1 is patentable.

For reasons similar to those described above with regard to independent claim 1, claim 5 is also patentable.

IV. DEPENDENT CLAIMS

The other claims are dependent from independent claim 1 and 5, discussed above, and are therefore believed patentable for at least the same reasons. Since each dependent claim is also deemed to define an additional aspect of the invention, however, the individual reconsideration of the patentability of each on its own merits is respectfully requested.

Similarly, because Applicant maintains that all claims are allowable for at least the reasons presented hereinabove, in the interests of brevity, this response does not comment on each and every comment made by the Examiner in the Office Action. This should not be taken as acquiescence of the substance of those comments, and Applicant reserves the right to address such comments.

CONCLUSION

In the event the Examiner disagrees with any of the statements appearing above with respect to the disclosures in the cited reference, or references, it is respectfully requested

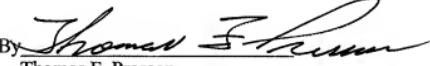
that the Examiner specifically indicate the portion, or portions, of the reference, or references, providing the basis for a contrary view.

Please charge any additional fees that may be needed, and credit any overpayment, to our Deposit Account No. 50-0320.

In view of the foregoing amendments and remarks, it is believed that all of the claims in this application are patentable and Applicant respectfully requests early passage to issue of the present application.

Respectfully submitted,

FROMMER LAWRENCE & HAUG LLP
Attorneys for Applicant

By 
Thomas F. Presson
Reg. No. 41,442
(212) 588-0800